ALUMINUM COMPANY OF AMERICA
P.O. BOX 472
ROCKDALE, TEXAS 76567
(512) 446-5811


ALCOA

TXD 008 091 712

DATE: 1989 MAY 03

TO: Regional Administrator

ADDRESS: 1445 ROSS AVENUE
DALLAS, TEXAS 75202

RE: SOFT HAMMER DEMONSTRATION/CERTIFICATION FOR MATERIALS DESTINED FOR TRADE WASTE INCINERATION

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, ALUMINUM COMPANY OF AMERICA, ROCKDALE, TEXAS (Generator name) has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(1) for CWM Profile TSS U16189 bearing EPA waste code(s) U133 .

This demonstration (see reverse) has been prepared following communication with Chemical Waste Management and reflects our efforts to locate practically available treatment which affords the greatest environmental benefit. We believe that the information submitted is true, accurate, and complete. Based on this information we have determined that incineration is the best practically available treatment.

If any further information is required, please contact me at 512-446-8235 (Phone Number).

Sincerely,

X L B Parker
(Signature)

## SOFT HAMMER DEMONSTRATION

Attachment 1

| | FACILITY OWNER | LOCATION | TREATMENT METHOD | TELEPHONE | CONTACT | DATE | EXPLANATION* |
|---|---|---|---|---|---|---|---|
| 1. | TRADE WASTE INCINERATION | 7 MOBILE AVE. SAUGET, IL 62201 | INCINERATION | 618-271-2804 | DANA HANLEY | 1989 MAY 04 | B |
| 2. | | | | | | | |
| 3. | | | | | | | |

*For no available treatment: insert number key from Attachment 3.

For available treatment: insert the letter key from Attachment 4.

ATTACHMENT 4
FIRST THIRD "SOFT-HAMMER DEMONSTRATION
Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located

A — Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.

B — Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.

C — Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.

D — A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.

E — Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.

F — Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.

G — Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies an found that they were not practically available for the following reason(s):

H — Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.

This waste is not suitable for incineration or fuels due to:

I — the low percentage of hazardous organic constitutents presents,
J — the low heating value of the waste,
K — the high percentage of inorganic constituents present,
L — the lack of located available capacity of incineration or fuels blending facilities.

This waste is not suitable for recovery due to:

M — The hazardous constituents are present in concentations that make recovery technologically impossible.
N — The hazardous constituents are present in concentrations that make recovery economically infeasible.
O — No recovery facilities were located that could treat this type of waste.
P — No recovery facilities were located that had capacity to treat this type of waste.

Q — The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.

dditional Comments:

# "SOFT-HAMMER" WASTES

## LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

Generator Name: ALUMINUM COMPANY OF AMERICA Manifest Number: LA 1124364

EPA Hazardous Waste Number: U133 CWM Profile Number: TSS U16189

This form is submitted to CHEMICAL WASTE MANAGEMENT, INC. in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alternative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.)

[X] **I. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED**

The soft-hammer waste I generate is (are) U133.
I have identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration to the Regional Administrator in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates, and a justification that I have chosen the best treatment that is practically available.

"I certify under penalty of law that the requirements of 40 CFR 268.8(a) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

[ ] **II. SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT IS THE ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE**

The soft-hammer waste(s) I generate or have treated is (are) _____.
I have made a good-faith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazardous constituents in the waste, as an alternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and an explanation of why no treatment is practically available. This soft-hammer waste must be disposed of in a landfill or surface impoundment meeting the minimum technological standards until treatment standards are set for the waste or May 8, 1990, whichever occurs first.

"I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false informations, including the possibility of fine or imprisonment."

[ ] **III. TREATMENT OR RECOVERY FACILITY HAS TREATED THE WASTE**

The following soft-hammer waste(s) was treated in accordance with the generator's demonstration: _____.

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

[ ] **IV. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP INJECTION WELL)**

The soft-hammer waste(s) I generate is (are) _____. This waste is being disposed of in a land disposal unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements described above.

X Signature _____ Title Environmental Superintendent Date 1989 MAY 04
E. B. Parker

ALUMINUM COMPANY OF AMERICA
P.O. BOX 472
ROCKDALE, TEXAS 76567

ALCOA

1989 February 24

CERTIFIED - RETURN RECEIPT REQUESTED

Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Attn: Hazardous and Solid Waste Division

Ref: Solid Waste Registration 30132
Aluminum Company of America

Dear Sir:

Attached are four copies of Part A of a permit application for storing and processing hazardous waste. The waste covered by the application is Spent Potlining which was listed as hazardous by the Environmental Protection Agency on 1988 September 13 and assigned the EPA Hazardous Waste Code No. K088.

Notification that Alcoa is a generator of this waste was submitted to the TWC in 1988 November and December.

If you have any questions about this application, you can contact me at 512-446-8235 or Mr. C. L. Green at 512-446-8205.

Sincerely,

E. Brooks Parker
Environmental Superintendent

B:dm0234

Copies to:
G. H. Lantz/C. L. Green (w/att.)
G. J. Crouth, Pittsburgh (wo/att.)

ALCOA CENTENNIAL 1988

Robledo

ALUMINUM COMPANY OF AMERICA
P.O. BOX 472
ROCKDALE, TEXAS 76567

ALCOA

1989 April 26

TXD008091712

Mr. William K. Honker, Chief
RCRA Permits Branch
U. S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Dear Mr. Honker:

In response to your letter of 1989 April 12 concerning Subpart X facilities, please be advised that no such facilities are operated by Aluminum Company of America at its Rockdale, Tx. works.

If you have any questions, please call me at 512-446-8235.

Sincerely,

E. Brooks Parker
Environmental Superintendent

C:dm04340

copies to:
G. H. Lantz/C. L. Green
G. J. Crouth, Pittsburgh

ALCOA CENTENNIAL 1988

1. Lowell
2. File

# TEXAS WATER COMMISSION

New RB



March 9, 1989

Mr. William K. Honker, Chief
Permits Section
Hazardous Waste Compliance Branch
U. S. Environmental Protection Agency
Region VI - 6H-CP
1445 Ross Avenue
Dallas, Texas 75202

Re: Aluminum Company of America
Solid Waste Registration Number 30132
EPA I.D. Number TXD008091712 IV

Dear Mr. Honker:

Enclosed is a Part A hazardous waste permit application for the subject facility.

Please address any comments to the Permits Section at (512) 463-8173.

Sincerely,

Ken A. Zarker, Head
Reports and Information Management Unit
Hazardous and Solid Waste Division

JA:cw

Enclosure

cc: William F. Bowles, District Manager, District 3, 3221 Franklin, Waco, Texas 76710-7302

# TEXAS WATER COMMISSION

## PERMIT APPLICATION
## FOR
## INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FACILITY

## PART A—FACILITY BACKGROUND INFORMATION

I. GENERAL INFORMATION

A. Applicant: Aluminum Company of America
(Individual, Corporation, or Other Legal Entity Name)

Address: P.O. Box 472

City: Rockdale State: TX Zip Code: 76567

Telephone Number: 512-446-8235

B. Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

° C. L. Green, Texas Area Manager
Aluminum Company of America
P.O. Box 472 - Rockdale, TX 76567 - (512) 446-8205
° E. B. Parker, Environmental Supt.
Same Address - (512) 446-8235
° Roger Nevola, Legal Counsel
Vinson & Elkins
First City Centre, 816 Congress, Austin, TX 78701-2496 (512) 495-8550

2. List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name: E. B. Parker

Address: Aluminum Company of America - P.O. Box 472

City: Rockdale State: TX Zip Code: 76567

Telephone Number: 512-446-8235

3. List the applicant's registered agent for service.

Name: C. T. Corporation System

Address: 1601 Elm St., Thanksgiving Tower, Suite 3700

City: Dallas State: TX Zip Code: 75201

Telephone Number: 214-979-1172

C. Operator: Identify the entity who will conduct facility operations If same as applicant, state "same as applicant."

Name: Same as applicant

Address:

City: State: Zip Code:

Telephone Number:

D. Ownership

1. Indicate the ownership status of the facility

a. Private X

(1) Corporation X
(2) Partnership _____
(3) Proprietorship _____
(4) Non-profit organization _____

b. Public _____

(1) Federal _____
(2) Military _____
(3) State _____
(4) Regional _____
(5) County _____
(6) Municipal _____

c. Other (specify) _____

2. Is facility *and* site property owned by applicant?

X Yes _____ No

If you checked "no",

a. Submit as an attachment a copy of the lease for use of said facility and/or site property, as appropriate; and

b. Identify the facility and/or site property owner. If same as applicant in Part A above, state "same as applicant." If different from the applicant, please note that the owner is required to sign the application on page 5.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Permit Application:

1. New X
2. Amendment _____ (TWC Permit Number: _____ )

F. Registration and Permit Information

1. Denote your TWC Solid Waste Registration Number. If none, state "none."
Registration 30132
2. Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit *number*, or the *date of application*, or *"none"*.

| Relevant Program and/or Law | Permit No. | Government Agency* |
|---|---|---|
| a. Texas Solid Waste Disposal Act | None | - |

| | | |
|---|---|---|
| b. Wastewater disposal under the Texas Water Code | WQ0000395 | TWC |
| c. Underground injection under the Texas Water Code | None | - |
| d. Texas Clean Air Act | See attached | TACB |
| e. Texas Uranium Surface Mining & Reclamation Act | None | - |
| f. Texas Surface Coal Mining & Reclamation Act | 001 | TRC |
| g. Hazardous Waste Management program under the Resource Conservation and Recovery Act | None | - |
| h. UIC program under the Safe Drinking Water Act | None | - |
| i. NPDES program under the Clean Water Act | TX0000876 | EPA |
| j. PSD program under the Clean Air Act | None | - |
| k. Nonattainment program under the Clean Air Act | None | - |
| l. National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act | None | - |
| m. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act | None | - |
| n. Dredge or fill permits under section 404 of the Clean Water Act | SPGP 86000263B | Corps |
| o. Other relevant environmental permits | None | - |

*Use the following acronyms for each agency as shown below:

TWC = Texas Water Commission
TACB = Texas Air Control Board
TRC = Texas Railroad Commission
TDH = Texas Department of Health
TDA = Texas Department of Agriculture
EPA = U.S. Environmental Protection Agency
CORPS = U.S. Army Corps of Engineers

G. Description of Business

1. Give a brief description of the nature of your business.

Primary Aluminum Production

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

Aluminum Ingot, Powder and Redraw Rod - 3334

TEXAS AIR CONTROL BOARD
PERMIT SUMMARY

| PERMIT NUMBER | DATE |
|---|---|
| R-2158 | 76/02/10 |
| R-2786 | 78/11/08 |
| R-4476 | 80/01/15 |
| R-454A | 77/10/21 |
| R-4612 | 78/08/11 |
| R-7084 | 81/12/21 |
| R-7559 | 87/01/28 |
| R-804 | 74/08/20 |
| R-9465 | 87/01/28 |
| S-17673 | 87/03/16 |

(I.G.2. continued)

I, W. J. Drake (Name), Texas Area Manager (Title)

I, _____ (Name), _____ (Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fine.

Signature: W. J. Drake, Date: 2/24/89

Signature: _____, Date: _____

SUBSCRIBED AND SWORN to before me by the said W J. Drake on this 24 day of Feb, 1989. My commission expires on the 25 day of July, 1992.

Cheryl Wiese
Notary Public in and for
Dylan County, Texas

II SITE BACKGROUND INFORMATION

A. Location of Site

1. Facility Name: Aluminum Company of America

Street Address, if available: Sandow, near Rockdale

County: Milam

2. Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.

Approximately eight (8) miles southwest of Rockdale, Texas, on FM 1786

3. Detail the access routes from the nearest U.S. or State Highway to the facility site.

Five miles west of Rockdale on U.S. Hwy. 79; then five (5) miles south of U.S. Hwy. 79 on FM 1786.

4. Submit as "Attachment A" a United States Geological Survey (USGS), 7½ minute quadrangle map. Indicate on this map the location of the site and the land use patterns of the areas within 1 mile (1.6 km) of the site boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map or a city map with sufficient scale to adequately show the site location and surrounding land use patterns. (Submission of an aerial photograph is recommended as it may clarify land use, topography, vegetation, etc., within the vicinity of the site.) This map and accompanying text should include the following information:

a. existing zoning at the site (if within the territorial limits of a city): N/A

b. location and distance to nearest residences, schools or other centers of community activity;

c. location of any utility easements, pipelines, or any underground oil and gas storage areas;

5. a. Submit as "Attachment B" a map indicating the boundaries of all adjacent parcels of land, and a list of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch or drawing with a scale adequate enough to show the cross-referenced affected landowners.

b. Indicate from what source(s) the names and addresses of persons identified as affected were obtained.

City ____
County ____
School District ____
Water District ____
Abstract Co. ____
Other (specify) X Alcoa Property Office

6. Enter the geographical coordinates of the site.

Latitude: 30 deg 33 min 49 sec

Longitude: 97 deg 04 min 42 sec

7. Is the facility located on Indian lands? Check one.

_____ Yes __X__ No

B. Legal Description of Site

Submit as "Attachment C" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s).

C. Site Selection Report

The applicant must submit a site selection report with this application which describes the process used to select the proposed site. The report should address how the site complies with the recommendations of the Commission which are outlined in Technical Guidline No. 2. Any deficiencies of the proposed site should be identified by the applicant as well as proposed remedies to correct those deficiencies. The purpose of the report is to inform the public and agency staff that the applicant has selected a site which he believes to be suitable for industrial solid waste management facilities and which meets the standards in Commission rules and guidelines.

D. Public Participation Activities N/A

If a local review committee has been established to facilitate communication between the applicant and the local host community (see Technical Guideline No. 2, II.D.), the applicant should summarize the activities of the committee and submit this summary with the application. Any report completed by the review committee must also be submitted.

## III. WASTES AND WASTE MANAGEMENT

A. Waste Generation and Management Activities

Is any hazardous industrial solid waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

__X__ Yes _____ No

If you checked "no," go to Section III.B.2. below.
If you checked "yes," answer the following question.

1. Are you presently registered with TDWR as a solid waste generator?

   __X__ Yes _____ No

   If you checked "no," contact the Hazardous & Solid Waste Division of TWC in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

   If you checked "yes," go to Section I of your Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1 below, listing all hazardous wastes and all mixtures containing any hazardous wastes which are presently or proposed to be handled at your facility. (see 40 CFR 261), attaching additional copies as necessary.

   In this table, "TWC Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TWC, enter "NA" for TWC Sequence Number and TWC Waste Code Number).

   For the EPA Hazard Code and EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated) for each waste and/or waste mixture.

   Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

## II.C. SITE SELECTION REPORT

Instructions for preparation of a site selection report references TWC Technical Guideline 2 which deals with landfills. This application is for a permit to treat and/or store hazardous wastes on-site prior to shipping them to an approved off-site hazardous waste management site for final disposal. The facilities that will be used in these on-site treatment and storage operations are existing buildings, tanks and treatment devices.

III B. Waste Management Facilities Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), provide the summary sheet shown in Table III-2 (Note: Please make copies of Table III-2 and submit the completed set of tables as "Attachment D").

2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

   X Yes _____ No

   If you checked "yes," complete Table III-3 indicating the hazardous industrial solid waste management facility components which were once utilized at your plant site but are no longer in service (i.e., inactive facility components).

   If you checked "no," and if no hazardous industrial solid waste is presently or proposed to be stored [for longer than 90 days (see TAC Section 335.69)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. For each facility component indicated in Table III-2 (Attachment D) and Table III-3, complete the following Table III-4 attaching additional copies as necessary. Enter the name of each facility component as specified in the earlier tables.

   Give the design capacity of each facility component in any of the units shown. In the case of inactive facilities for which design details are unavailable, an estimate of the design capacity is sufficient.

   Please note that each facility component should be described in your own words on the line provided for "verbal description."

4. Provide an estimate of the total weight (lbs) of hazardous industrial solid waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Facilities and Components

1. Submit as "Attachment E" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the overall plant site, depicting the following:

   a. The approximate boundaries of the site (described in Section II B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed facility component (see Tables III-2 and III-3 for facility components). Each depicted area should be labeled to identify the facility component(s), component status (i.e., active, inactive, or proposed), and area size in acres.

   b. The overall facility and all surface intake and discharge structures;

   c. All on-site injection wells where liquids are injected underground;

   d. All known monitor wells and boreholes within the property boundaries of the overall plant site, and

   e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).

2. Submit as "Attachment F" photographs which clearly delineate all hazardous waste facility structures and storage, processing, and disposal areas, as well as sites of future storage, processing, and disposal areas.

III. B4. Estimate of the total weight in pounds of spent potlining that has been disposed of and/or stored within site boundaries and not removed to another site - $3 \times 10^8$ pounds or 150,000 tons.

b:dm0202/6